UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

TARENCE BANKS,
    Plaintiff,

    v.   Case No.: 14-cv-4381

NURSE LESLIE, et al.,
    Defendants.

PLAINTIFF'S DECLARATION
IN SUPPORT OF
PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION TO COMPEL DISCOVERY

I, Tarence Banks, being of sound mind and body, free from threat or coercion, and having reached the age of majority, do hereby testify that:

1.   I am the plaintiff in the above captioned case.

2.   I signed a medical release while at RCJ that gave the Medical Defendants access to all medical records relevant to this case. As I read the Medical Defendants' discovery request they want access to all medical information from any time in my life, even if it is before and/or after the medically relevant events in this case. I cannot see why every intimate detail of my medical history is relevant. It is privileged for a reason. Further, the Medical Defendants actually treated me. They have those treatment records. Additionally, they had medical information from when I was transferred to RCJ from prison in the past.

3.   The Medical Defendants are arguing that I have not provided them with an exact description of their actions or omissions and the documents that will support my contentions. I have stated that the Defendants have all the documents that are relevant, and this is true. The many complaints I made while at RCJ are well documented. So, the Medical Defendants do not seem interested in what I contend. They know this all too well. Instead, the Medical Defendants are interested in my trial strategy. As I understand the rules, this is not discoverable.

4.   I have acted in good faith. I am willing to comply with any reasonable requests. However, the Medical Defendants do not seem to be acting reasonably.

Pursuant to 28 USC § 1746, I state under penalty of perjury that the above four (4) averments are true and correct to the best of my recollection and knowledge.

Dated: 01/12/16

Signature Page Follows

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Tarence A. Banks Sr

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